

Requirements for Providing Service:

A comparison of Video Relay Service and Video Remote Interpreting

Hands On Video Relay Services, Inc.

Definition of terms:

Video Relay Service (VRS): A public, on-demand telecommunication service regulated under the FCC's TRS program that provides Deaf and Hard of Hearing persons with access to communication over standard phone lines.

Video Remote Interpreting (VRI): A fee-for-service form of interpreting which allows consumers to schedule interpreters via a point-to-point videoconference instead of having a live, on-site interpreter.

Requirement	VRS	VRI	Comment
All FCC references pertain to FCC TRS Rules 47 U.S.C. § 225 Docket 98-67			
DS 3 Internet Connections 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS required to accommodate many simultaneous calls. VRI can operate on one ISDN or T-1, or high-speed access line.
Local Area Network Required 47 C.F.R. § 64.604(b)(2)	Yes	No	All VRS stations are connected to the network to handle multiple calls.
Redundant Networks 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS regulations, service must be provided even in the event of emergencies or disasters.
Firewall Technology 47 C.F.R. § 64.604(a)(2)(i)	Yes	No	VRI is "point-to-point." VRS must deal with firewall issues on the customers' end. VRS must guarantee the confidentiality of calls, requiring heavy-duty firewall protection.
Network Engineer 47 C.F.R. § 64.604(a)(2)(i)	Yes	Limited	VRS requires high-level engineers for integration with Telecom's platforms and guaranteed service despite emergencies or disasters. VRI can operate with technician-level personnel.
Extensive Hardware Investment 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS must accommodate multiple call volume. VRI can initiate service with one workstation.
Emergency Power Requirements 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS Regulations.
Telephone Network 47 C.F.R. § 64.603	Yes	No	Outbound calls are made on POTS lines. Also, Voice Initiated Calls are received by phone. Note that currently, technology does not exist for providing voice initiated calls via VRS, and must be developed to comply with TRS regulations.

VRS Platform/Database 47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	Required of VRS by Telecoms for reporting purposes.
Video Codec Research and Development 47 C.F.R. § 64.604(c)(5)	Yes	No	VRS must accommodate all callers, despite low bandwidth. NetMeeting is not satisfactory to users.
Customized Software 47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	VRI = off-the-shelf programs. FCC requires complex reporting and data capture.
Software Engineers	Yes	No	See Network Engineer comments.
Extensive Software Investment 47 C.F.R. § 64.604(b)(2)	Yes	No	VRS must accommodate call volume. VRI can use off-the-shelf components, and initiate service with one workstation, thus requiring fewer software licenses, etc.
Limited Equipment Cost	No	Yes	VRI requires a simple “point-to-point” video program. VRI can elect to limit provision of service. VRS must accept calls from any point of origination, including ISDN or IP lines, Mac or PC computers, videophones, or set-top videoconferencing devices.
Secure Call Center	Yes	No	Per FCC TRS Regulations, service must be provided from a secure location.
Call Center Management 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	Per FCC TRS Regulations. Secured call center requires Management for daily operations.
Full-time Trainer(s) 47 C.F.R. § 64.604(a)(1) 47 C.F.R. § 64.604(a)(2)(ii)	Yes	No	Per FCC TRS Regulations, VRS must offer standardized service, functionally equivalent to a phone call. This requires training.
Standardized Policies and Procedures 47 C.F.R. § 64.604(a)(3)	Yes	No	Per FCC TRS Regulations, VRS must offer standardized service, functionally equivalent to a phone call.
Customer Service Organization and Database 47 C.F.R. § 64.604(c)(1)(i) 47 C.F.R. § 64.604(c)(1)(ii) 47 C.F.R. § 64.604(c)(2)(i) 47 C.F.R. § 64.604(c)(2)(ii)	Yes	No	VRI is not regulated. Telecoms require customer service function from VRS.

Coverage for Potentially Unlimited Volume 47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(b)(4)	Yes	No	VRS is required to forecast and provide coverage for call volume.
ASA Requirements 47 C.F.R. § 64.604(b)(2) 47 C.F.R. § 64.604(b)(4)	Yes	No	Per FCC TRS Regulations, must have sufficient staff to provide less than 10 second wait time for 85% of calls received. Failure to comply results in \$1000/day imposed fines.
Complex Reporting and Billing 47 C.F.R. § 64.604(c)(5)(ii) 47 C.F.R. § 64.604(c)(5)(iii)(C) 47 C.F.R. § 64.604(c)(5)(iii)(E) 47 C.F.R. § 64.604(c)(5)(iii)(H)	Yes	No	FCC requires extensive reporting features.
Certified/Qualified Interpreters 47 C.F.R. § 64.604(a)	Yes	No	Per FCC VRS Regulations. VRI is not regulated. This is desirable but not required for VRI.
Discrimination in Accepting Interpreting Assignments 47 C.F.R. § 64.604(a)(1)	No	Yes	VRI allows for discrimination in acceptance of interpreting assignments and placement according to skill level. VRS interpreters must ALL have a level of competence to handle any call that is received with no advance notice of the subject matter or signing styles involved. This requires many years of experience to acquire the depth of skill necessary, which translates into higher costs for such skills, and higher costs for recruitment.
Personnel/Legal Consultation for Compliance with FCC Regulations	Yes	No	VRS requires working with the FCC, incurring legal costs and expenses.
Contract Negotiations 47 C.F.R. § 64.604(f)(2)	Yes	No	VRS providers must either contract with entities authorized to bill the TRS fund or obtain or contract with certified state programs, either one creating additional administrative costs.